

April 2, 2009

Ms. Terese VanDonsel
United States Environmental Protection Agency
Office of Superfund, Region 5
SR-6J
77 West Jackson
Chicago, IL 60604-3590

Subject: Subsurface Mapping of Top of Ashtabula Till (Revised)
Detrex Site and Limited Areas Surrounding Fields Brook Superfund Site
Detrex Corporation, Ashtabula, Ohio
Docket No. V-W-98-C-450

Dear Ms. VanDonsel:

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) is submitting two (2) figures depicting the interpreted top of the Ashtabula Till formation beneath the above referenced site. The attached figures revise the maps previously submitted in a letter from URS dated January 14, 2009. The revisions were completed to include additional data gathered during the completion of the Western Area Subsurface Investigation. This report was submitted to the United States Environmental Protection Agency (USEPA) on March 30, 2009. **Figure 1** presents a 2-d contour map depicting the top of the Ashtabula Till based on a compilation of the till elevation data from historical logs of soil boring and monitoring well installations along with the data from the recently completed subsurface investigation. **Figure 2** presents the same data as a 3-d perspective of the top of the Ashtabula Till.

As shown on **Figures 1 & 2** noted depressions in the till, as previously reported, remain below the former lagoon area (i.e. Detrex Source Control Area) and in the northwest corner of the site. The additional data from the Western Area Subsurface Investigation further support the previous interpretation indicating a ridge in the till between the former lagoon area located to the north, and Fields Brook located to the south of the site. The addition of the new data points, as well as the associated analytical data presented in the Western Area Subsurface Investigation Report, continues to support Detrex's assertion that there are no viable subsurface migration pathways for DNAPL from the Detrex Source Control Area through the till, and that there are no noted impacts from DNAPL along the western portion of Detrex property towards Fields Brook due to DNAPL migrating beneath the site towards Fields Brook along the till contact.

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URS, on behalf of Detrex, plans to continue to update these maps as any additional data is collected. If you have any questions regarding this submittal, please do not hesitate to contact either Tom Steib at 440-997-6131 or me at 216-622-2432 at your convenience.

Sincerely,

URS Corporation - Ohio

Martin L. Schmidt, Ph.D.
Vice President

Enclosure – Figures 1&2 (revised)

cc: R. Currie – Detrex Corporation
T. Doll - Detrex Corporation
R. Williams – Ohio EPA

T. Steib – Detrex Corporation
B. Rule – demaximus
D. Gray – URS

Detrex Site - Top of Till Contour Map
Contour Interval = 2 ft-msl

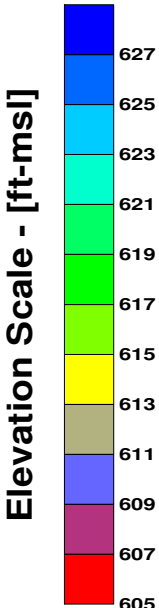
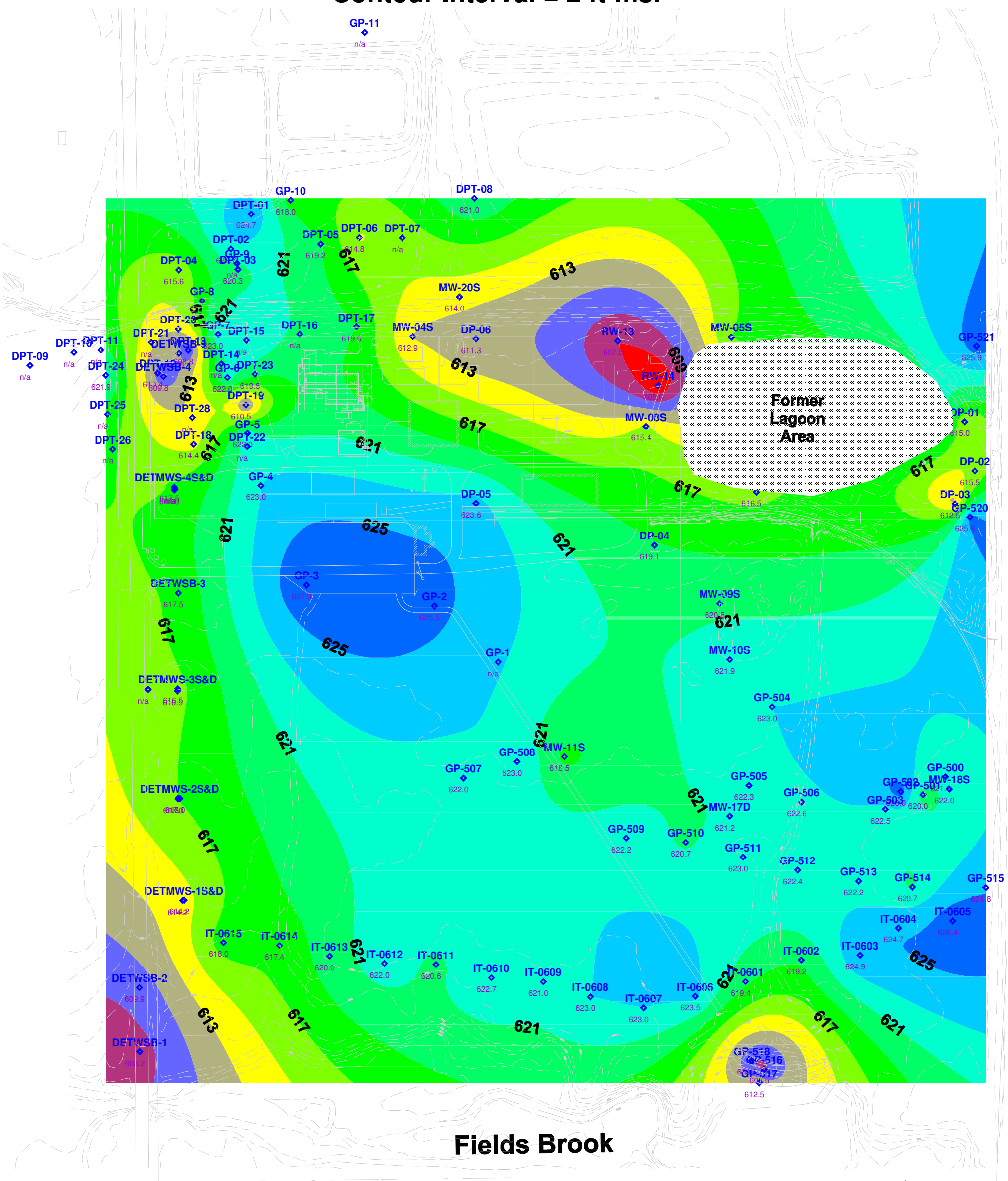


Figure 1

Detrex Site - Top of Till Map (3d Perspective Looking Northeast)

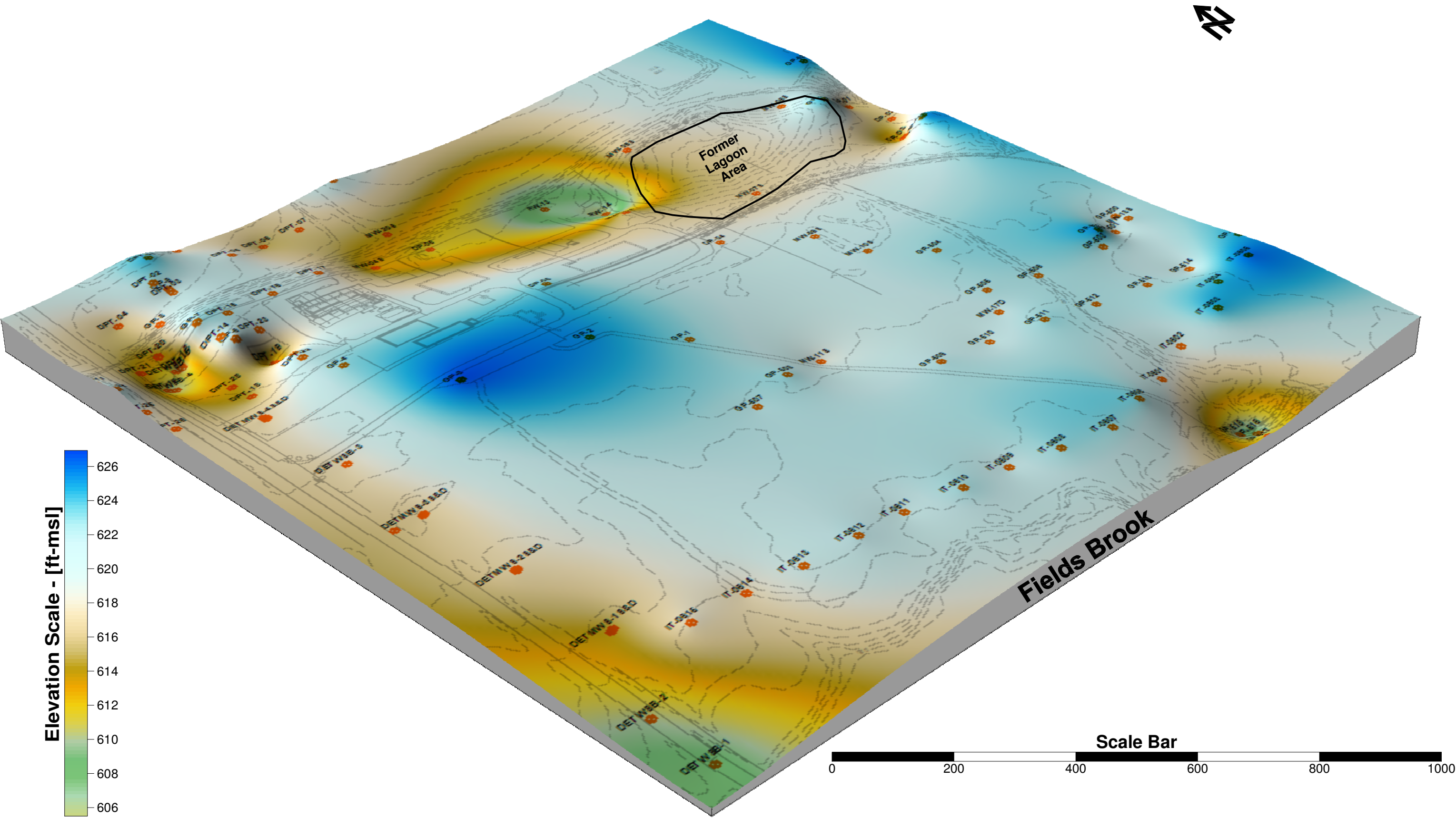


Figure 2